

From: Riley, Rachel <rachel.riley@katten.com>
Sent: Thursday, February 11, 2021 4:35 PM
To: Furtado, Kathryn (CRM) <Kathryn.Furtado@CRM.USDOJ.GOV>; Meyer, Ryan J. <ryan.meyer@katten.com>;
UDHNANI, PATRICIA - US <patricia.udhnani@caci.com>
Cc: McCarthy, Brandon N. <brandon.mccarthy@katten.com>; Kosmidis, John (CRM)
<John.Kosmidis@CRM.USDOJ.GOV>; Rodriguez, Ashley K. - US <ahamrick@caci.com>; Art@arthurwleach.com;
rwestling@ebglaw.com; jessica@arthurwleach.com
Subject: RE: US v. Fluitt - Satary Privilege Assertions

All,

I am filling in for Ryan Meyer while he is on family leave. With respect to the Satary log, we have a few questions that will greatly assist us in formulating objections or refraining from objecting to the contents of the log.

First, is our understanding correct that this log reflects privilege assertions on behalf of Khalid Satary individually? Second, and relatedly, there are several other parties who appear on various emails whose relationship to Satary we do not know. It would be very helpful if we could get a short explanation of who these individuals are, so that we can assess the privilege claim. I've included a list of these individuals below.

- Yolanda Nieves Yolanda Nieves yolanda@shirazholdings.com
- tommy edwards edwards_tommy41@yahoo.com
- Edward Klapp eklapp@bellsouth.net
- Greg <gregtrotta13@gmail.com>
- Andrew Cappello acappello@eloquenthealth.com
- Abdullah Ayoub abd.ayoubjor@gmail.com
- Samuel Carden sam.carden@gmail.com
- Randy Berinhout <randyberinhout@gmail.com>

This information would greatly assist us in evaluating the privilege assertions. Additionally, there's been some inclement weather in Dallas causing technology delays today (and expected to continue through the weekend). Would it be acceptable if we provide our objections by next Thursday instead of tomorrow? We would greatly appreciate it. I am available to discuss on my cell phone at 214 534 7753.

Thank you.
Rachel

Rachel Riley
Associate

Katten

Katten Muchin Rosenman LLP
2121 North Pearl Street, Suite 1100 | Dallas, Texas 75201
direct +1.214.765.3639
rachel.riley@katten.com | katten.com

-----Original Message-----

From: Furtado, Kathryn (CRM) <Kathryn.Furtado@usdoj.gov>
Sent: Tuesday, February 2, 2021 3:27 PM
To: Meyer, Ryan J. <ryan.meyer@katten.com>; UDHNANI, PATRICIA - US <patricia.udhnani@caci.com>
Cc: McCarthy, Brandon N. <brandon.mccarthy@katten.com>; Kosmidis, John (CRM) <John.Kosmidis@usdoj.gov>;
Rodriguez, Ashley K. - US <ahamrick@caci.com>; Art@arthurwleach.com; rwestling@ebglaw.com;
jessica@arthurwleach.com; Riley, Rachel <rachel.riley@katten.com>
Subject: RE: US v. Fluitt - Satary Privilege Assertions

EXTERNAL EMAIL – EXERCISE CAUTION

No objection from the filter team.

Best regards,
Kathryn

Kathryn Furtado
Trial Attorney
1400 New York Avenue NW
Washington, DC 20530
O: (202) 307-2884
C: (202) 794-2173

-----Original Message-----

From: Meyer, Ryan J. <ryan.meyer@katten.com>
Sent: Tuesday, February 2, 2021 3:54 PM
To: UDHNANI, PATRICIA - US <patricia.udhnani@caci.com>
Cc: McCarthy, Brandon N. <brandon.mccarthy@katten.com>; Furtado, Kathryn (CRM) <Kathryn.Furtado@CRM.USDOJ.GOV>; Kosmidis, John (CRM) <John.Kosmidis@CRM.USDOJ.GOV>; Rodriguez, Ashley K. - US <ahamrick@caci.com>; Art@arthurwleach.com; rwestling@ebglaw.com; jessica@arthurwleach.com; Riley, Rachel <rachel.riley@katten.com>
Subject: Re: US v. Fluitt - Satary Privilege Assertions

Patricia,

We will review these, though, given the voluminous nature, we do not expect to have objections (if any) to circulate until next week. Is that acceptable to everyone?

Thanks,

Ryan

Sent from my iPhone

On Feb 2, 2021, at 11:03 AM, UDHNANI, PATRICIA - US <patricia.udhnani@caci.com> wrote:

EXTERNAL EMAIL – EXERCISE CAUTION
Counsel –

Please find attached privilege assertions from privilege holder, Khalid Satary. Pursuant to the Discovery Protocol entered in this case, we can meet and confer regarding the assertions (Protocol Section 5(b)(iii)). Counsel for Mr. Fluitt, please let us know if you object to any of the assertions and we can set up a meet & confer teleconference.

Thanks.

-Patricia Udhani

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<Privilege Log - ksatory@gmail.com (priv assertions).xlsx>

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